UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8, MONTANA OFFICE
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HELENA, MONTANA 59626

Ref: 8MO

April 15, 2010

Mr. Leaf Magnuson
Beaverhead-Deerlodge National Forest
420 Barrett Street
Dillon, Montana 59725

Re: CEQ #20100059, EPA Comments on East Deer Lodge Valley Landscape Restoration Management DEIS

Dear Mr Magnuson:

The U.S. Environmental Protection Agency (EPA) Region VIII Montana Office has reviewed the Draft Environmental Impact Statement (DEIS) for the Beaverhead-Deerlodge National Forest's East Deer Lodge Valley Landscape Restoration Management Project in accordance with EPA responsibilities under Section 102(2)(C) of the National Environmental Policy Act (NEPA), Section 309 of the Clean Air Act, and the Council on Environmental Quality (CEQ) regulations, 40 CFR Parts 1500-1508. Section 309 of the Clean Air Act directs EPA to review and comment in writing on the environmental impacts of any major Federal agency action. EPA's comments include a rating of both the environmental impact of the proposed action and the adequacy of the NEPA document.

The DEIS indicates that the East Deerlodge Management Area is experiencing widespread mortality of trees and fuel accumulation as a result of an ongoing mountain pine beetle epidemic. EPA supports the purpose and need for the East Deer Lodge Valley (EDLV) Landscape Restoration Management Project to carry out restoration efforts in collaboration with the interested public to help achieve Forest Plan goals and objectives for the EDLV area. We are pleased that among the Forest Plan goals discussed in the project purpose and need is restoration of aquatic habitat (i.e., improvement of water quality, fish and riparian habitat). We support inclusion of watershed restoration activities in vegetation and travel management projects, particularly in drainages of water quality impaired streams listed by the State of Montana under Section 303(d) of the Clean Water Act (e.g., Peterson Creek).

It is important that the proposed EDLV Landscape Restoration Management Project be consistent with the Total Maximum Daily Load (TMDL) and Water Quality Plan being developed by the State of Montana to improve water quality and restore full support of beneficial uses to 303(d) listed Peterson Creek. EPA is pleased that the proposed action includes activities to reduce sediment delivery to Peterson Creek and other waterbodies from roads (e.g.,

maintenance of 35.8 miles of road; decommissioning of 3.6 miles of existing road following harvest; remove or replace 7 culverts to improve fish passage and replace undersized culverts; implement road improvements to reduce sediment delivery to North Fork Cottonwood Creek and North Fork Perkins Gulch; restore 5.7 miles of trail along Baggs Creek by converting the trail from motorized to non-motorized use). The Proposed Action would also permanently or seasonally close 22.82 miles of forest roads, and thus, reduce road density in the project area from 2.9 miles/mile^2 to 2.6 miles/mile^2, and reduce the riparian conservation area (RCA) road/stream ratio from 56% to 47% when the project is completed.

Road system improvement measures are critical to protecting aquatic health (e.g., removing and replacing culverts, installing drainage dips or surface water deflectors, armoring drainage structures, grading and replacement of aggregate to reinforce wet surface areas, ditch construction and cleaning). EPAfully supports road decommissioning and reduction in road density, especially road stream crossing density, since such reductions have been correlated with improved aquatic health in many areas, and lower road densities are also often associated with improved wildlife habitat and security. Closures of roads near streams with many stream crossings are more likely to have water quality benefits than closure/decommissioning of roads on upper slopes and ridges. Also, lower road densities are often associated with improved wildlife habitat and security, and reduced risks of human caused fires, which could be important in an area with high fuels/fire risk and/or wildland/urban interface issues.

In addition, we are pleased that restoration treatments are proposed to reduce impacts from livestock grazing to protect 5.2 miles of streams and approximately 117 acres of riparian habitat (e.g., reduce livestock impacts to riparian areas and wetlands using construction of worm fences, felled trees, and the strategic placement of salt, and development of off-site water sources across 5.2 miles of streams). We also appreciate the proposed placement of large woody debris wood in 3.4 miles of North Fork Cottonwood Creek, Baggs Creek, and Middle Fork Cottonwood Creek and several other streams, to increase habitat complexity and pool volume.

Use of INFISH riparian buffers and appropriate vegetation management BMPs should minimize short-term sediment delivery associated with proposed timber harvest activities. We want to note that WEPP modeling results (Table 21) indicate that two harvest units in the Peterson Creek Subwatershed have high potential for increases in sediment delivery to fish bearing streams (units 24T and 29T). To minimize sediment delivery to Peterson Creek during harvests we recommend use of less disturbing logging methods such as logging during winter on snow or frozen ground or skyline cable logging for these high sediment delivery harvest units in the Peterson Creek drainage.

Also since the DEIS identifies sediment delivery from roads during log hauling as an important sediment source, we want to recommend use of road practices to reduce road sediment delivery during log hauling. Such practices include closing roads and avoiding road use during spring breakup conditions to reduce rutting of roads that increase road erosion and sediment production (i.e., ruts channel road runoff along roads); graveling of haul roads; avoiding snow plowing of roads later in winter used for log haul to limit runoff created road ruts during late winter thaws. We also encourage grading of unpaved roads in a manner that avoids road erosion and sediment transport to streams and wetlands, particularly avoiding sidecasting of

graded material over the shoulder, which widens shoulders and moves road sediment to locations where it is more likely to be transported to streams and wetlands.

The DEIS reports that during project implementation the annual sediment delivery from roads in the Peterson Creek Subwatershed would increase to 2,755 pounds per year due to log haul along roads, but that total estimated annual road sediment delivery for the Peterson Subwatershed would be reduced by 531 pounds per year over the long-term due to proposed road closures. A 24 percent reduction in post-haul RCA roads is predicted to occur in Peterson Creek, which would decrease long-term sediment delivery and improve aquatic conditions in this water quality impaired stream. Road density in the Peterson Subwatershed would decrease from 3.4 miles/miles^2 to 2.9 miles/miles^2 and RCA Road/Stream Ratio would decrease from 46% to 35%. Thus, while there would be short-term increase in sediment delivery to Peterson Creek during project implementation, over the long-term sediment delivery to Peterson Creek would decrease (e.g., Table 49 reports a 0.6 tons/year long-term reduction in sediment delivery in the Peterson Subwatershed).

However, the overall net decrease in sediment delivery over the long-term can only be achieved if the proposed watershed restoration work is funded and implemented. On occasion we have observed watershed restoration activities included in projects that are sometimes not fully funded (i.e., conduct of watershed restoration work is based on assumptions that funding for implementation may become available). Thus, it is sometimes not clear when, or even if, proposed watershed restoration work will be implemented in relation to other project activities. We did not see information in the DEIS that indicated that the proposed watershed improvement work for the EDLV Landscape Restoration Management Project will be fully funded. Watershed rehabilitation work that is proposed which cannot be implemented on a timely basis in relation to other project activities due to lack of funding has less value in mitigating project effects. We recommend that the FEIS disclose additional information on the availability of adequate funding to carry out the proposed watershed restoration work, and an estimated schedule of when restoration work will be carried out in relation to other project activities.

Proposed road system improvements, livestock management improvements, and woody debris placement for improving habitat complexity and productivity and channel stability should promote water quality and aquatic habitat improvements over the long-term. Accordingly it appears that the proposed project would likely be consistent with TMDLs being developed to improve water quality and promote restoration of full support of beneficial uses in Peterson Creek as long as proposed watershed restoration work is funded and carried out.

We also recommend that the BDNF coordinate with Montana DEQ TMDL program staff to assure that the MDEQ also considers the proposed EDLV Landscape Restoration Management actions to be consistent with TMDLs and water quality improvement in Peterson Creek (contact MDEQ staff such as Mr. Mark Kelley at 406-444-3508, Mr. Dean Yashan at 406-444-5317, and/or Mr. Robert Ray at 406-444-5319).

The EPA's further discussion and more detailed questions, comments, and concerns regarding the analysis, documentation, or potential environmental impacts of the East Deer Lodge Valley Landscape Restoration Management Project are included in the enclosure with this letter. Based on the procedures EPA uses to evaluate the adequacy of the information and the potential environmental impacts of the proposed action and alternatives in an EIS, the DEIS has been rated as Category EC-2 (Environmental Concerns - Insufficient Information). A copy of EPA's rating criteria is attached. While EPA is supportive of the project purpose and need to address forest restoration needs affected by an ongoing mountain pine beetle epidemic, there is some concern regarding potential short-term impacts to water quality and availability of funding to carry out watershed restoration activities so that the proposed project is consistent with TMDLs for restoration of impaired waters in the project area. We recommend additional analysis and information to fully assess and mitigate all potential impacts of the management actions.

The EPA appreciates the opportunity to review and comment on the DEIS. If we may provide further explanation of our comments please contact Mr. Steve Potts of my staff in Helena at 406-457-5022 or in Missoula at 406-329-3313 or via e-mail at potts.stephen@epa.gov. Thank you for your consideration.

Sincerely,

Julie A. DalSoglio
Director
Montana Office

Enclosures
cc: Larry Svoboda/Connie Collins, EPA 8EPR-N, Denver
Robert Ray/Mark Kelley/Dean Yashan, MDEQ, Helena